

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

ST. PAUL FIRE AND MARINE INSURANCE
COMPANY,

Plaintiff,

v.

PELLA CORPORATION AND PELLA
WINDOWS AND DOORS, INC.,

Defendants.

Case No.: 4:11-CV-00504-JAD-TJS

**DECLARATION OF KEITH
MCKENNA IN SUPPORT OF
DEFENDANTS' MOTION
TO DISMISS OR STAY
LITIGATION**

I, KEITH MCKENNA, declare as follows:

1. I am a member of the law firm Kasowitz, Benson, Torres & Friedman LLP, attorneys for defendants Pella Corporation and Pella Windows and Doors, Inc. (collectively, "Pella"). I submit this declaration in support of Defendants' Motion to Dismiss or Stay this litigation.

2. Attached hereto as Exhibit A is a true and accurate copy of the first amended complaint filed against Pella on November 8, 2006 in the lawsuit captioned *Saltzman et al v. Pella Corp., et al.*, Case No. 1:06-cv-04481.

3. Attached hereto as Exhibit B is a true and accurate copy of the complaint filed by Pella on October 26, 2011 in the Superior Court of the State of Delaware, New Castle County in the lawsuit captioned *Pella Corporation, et al. v. American Casualty Company of Reading, PA, et al.*, Case No. N11C-10-223 JRS, without exhibits.

I declare under penalty of perjury under that the foregoing is true and correct to the best of my knowledge and belief.


Keith McKenna

Executed: December 20, 2011
New York, New York